

# **EXHIBIT F**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FRANK CARBONE, ANDREW CORZO,  
SAVANNAH ROSE EKLUND, SIA HENRY,  
ALEXANDER LEO-GUERRA, MICHAEL  
MAERLENDER, BRANDON PIYEVSKY, KARA  
SAFFRIN, and BRITTANY TATIANA WEAVER,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE  
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,  
THE TRUSTEES OF COLUMBIA UNIVERSITY IN  
THE CITY OF NEW YORK, CORNELL  
UNIVERSITY, TRUSTEES OF DARTMOUTH  
COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU  
LAC, THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**[PROPOSED] ORDER  
REGARDING DISCOVERY  
SOURCES, DATE RANGES,  
AND DEADLINES**

The Court enters the following Order regarding Discovery Sources, Date Ranges, and Deadlines:

1. By January 20, 2023, each Defendant (with the exception of Caltech) shall each designate appropriate custodians of documents from its President's Office and Development Office, to allow Plaintiffs to take discovery central to their theory of liability;
2. Defendants that allege they withdrew from the alleged conspiracy shall produce the discovery requested for time periods after the alleged withdrawals, to the same end-date ordered for the other Defendants;
3. Five Defendants (Brown, Dartmouth, Northwestern, Notre Dame, and Yale) shall produce the admissions scoring data responsive to Request Nos. 2 and 3 in Plaintiffs' Second Set of Requests for Production;
4. By January 20, 2023, the Parties shall complete global meet-and-confers concerning the scope of discovery of post-January 9, 2022 communications; and by January 27, 2023, file a Joint Status Report either informing the Court of the resolution of that issue or setting forth the Parties' positions on that issue, which will then be ripe for the Court's resolution;
5. By January 20, 2023, the Parties shall complete global meet-and-confers on any disputes about TAR; by January 23, 2023, the Parties shall complete global meet-and-confers on any disputes concerning Search Terms; and by the close of January 27, 2023, the Parties shall file a Joint Status Report either informing the Court of the resolution of those issues, or setting forth the parties' positions on those issues, which will then be ripe for the Court's resolution.

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Matthew F. Kennelly  
United States District Judge